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7 Counsel for Petitioner
8 Samanpreet Singh Bath

9 UNITED STATES DISTRICT COURT FOR THE
10 SOUTHERN DISTRICT OF CALIFORNIA

11 SAMANPREET SINGH BATTH, 

12 

13 Petitioner,
14 v.

15 PAMELA BONDI, in her official capacity as
16 Attorney General,

17 KRISTI NOEM, in her official capacity as
18 Secretary of the Department of Homeland
19 Security,

20 U.S. DEPARTMENT OF HOMELAND
21 SECURITY,

JEREMY CASEY, in his official capacity as
Warden of Warden of the
Imperial Regional Adult Detention Facility,

TODD M. LYONS, in his official capacity as
acting director of US Immigration and Customs
Enforcement,
Respondents.

Case No. '26CV1362 RBM DEB

MOTION FOR
TEMPORARY
RESTRAINING
ORDER/PRELIMINARY
INJUNCTION

1
2 Petitioner respectfully requests that the Court grant his Motion for a
3 Temporary Restraining Order and Preliminary Injunction. The grounds for this
4 motion are set forth in the accompanying memorandum of law, the Complaint, and
5 the applicable law.

6 **RESPECTFULLY SUBMITTED this Third Day of Month March, 2026**

/s/Jagbir Terkiana

Jagbir Singh Terkiana

(CA SBN #339166)

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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion for Temporary Restraining Order and/or Preliminary Injunction and any attachments using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

**/s/Jagbir Terkiana
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Dated: March 3, 2026